

**CHRIS MCCONNELL**

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*Counsel for the State*

**MONTANA THIRTEENTH JUDICIAL DISTRICT COURT  
 YELLOWSTONE COUNTY**

STATE OF MONTANA,

Plaintiff,

v.

JESSICA LEIGH SIEGEL,  
 aka Jessica Hubley  
 aka Jessica Walker

Defendant.

Case No.

**INFORMATION**

Chris McConnell, Special Deputy Yellowstone County Attorney for the State of Montana and Legal Counsel for the Commissioner of Securities and Insurance, Office of the Montana State Auditor, having first obtained leave of this Court, accuses Defendant **JESSICA LEIGH SIEGEL** (Defendant) of committing the following offenses in Yellowstone County, Montana:

**COUNT I – CRIMINAL INSURANCE FRAUD**

**(LP Anderson)**

Defendant committed the offense of **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, as defined in Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2017-2019). From approximately August 23,

2019, to May 29, 2020, the Defendant, pursuant to a common scheme, purposely or knowingly presented or caused to be presented to or by an insurer a materially false or altered application of insurance. The Defendant presented or caused to be presented to Colonial Life and Accidental Insurance Company (Colonial) approximately 22 materially false or altered applications of insurance involving fictitious “employees” of LP Anderson.

The Defendant’s series of acts resulted in a pecuniary loss to the victim of at least \$1,500, or \$1,500 in value.

A person convicted of the offense of insurance fraud involving a common scheme shall be fined an amount not to exceed \$50,000 or be imprisoned in a state prison for a term not to exceed 10 years, or both.

## **COUNT II – CRIMINAL INSURANCE FRAUD**

### **(Sylvan Landscaping)**

Defendant committed the offense of **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, as defined in Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2017-2019). From approximately August 9, 2019, to September 27, 2019, the Defendant, pursuant to a common scheme, purposely or knowingly presented or caused to be presented to or by an insurer a materially false or altered application of insurance. The Defendant presented or caused to be presented to Colonial approximately 58 materially false or altered applications of insurance involving fictitious “employees” of Sylvan Landscaping and their spouses.

The Defendant’s series of acts resulted in a pecuniary loss to the victim of at least \$1,500, or \$1,500 in value.

A person convicted of the offense of insurance fraud involving a common scheme shall be fined an amount not to exceed \$50,000 or be imprisoned in a state prison for a term not to exceed 10 years, or both.

### **COUNT III – CRIMINAL INSURANCE FRAUD**

**(McKee Inc.)**

Defendant committed the offense of **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, as defined in Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2019). From approximately May 30, 2019, to December 20, 2019, the Defendant, pursuant to a common scheme, purposely or knowingly presented or caused to be presented to or by an insurer a materially false or altered application of insurance. The Defendant presented or caused to be presented to Colonial at least 24 materially false or altered applications of insurance involving fictitious “employees” of McKee Inc.

The Defendant’s series of acts resulted in a pecuniary loss to the victim of at least \$1,500, or \$1,500 in value.

A person convicted of the offense of insurance fraud involving a common scheme shall be fined an amount not to exceed \$50,000 or be imprisoned in a state prison for a term not to exceed 10 years, or both.

### **COUNT IV – CRIMINAL INSURANCE FRAUD**

**(Family Tree)**

Defendant committed the offense of **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, as defined in Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2017-2019). On or about February 21, 2019, the Defendant, pursuant to a common scheme, purposely or knowingly presented or caused to be presented to or by an insurer a materially false or altered application of insurance. The Defendant presented or caused to be presented to Colonial approximately nine materially false or altered applications of insurance involving two fictitious “employees” of Family Tree and the owner of Family Tree.

The Defendant's series of acts resulted in a pecuniary loss to the victim of at least \$1,500, or \$1,500 in value.

A person convicted of the offense of insurance fraud involving a common scheme shall be fined an amount not to exceed \$50,000 or be imprisoned in a state prison for a term not to exceed 10 years, or both.

### **COUNT V – CRIMINAL INSURANCE FRAUD**

#### **(Hays Dental)**

Defendant committed the offense of **CRIMINAL INSURANCE FRAUD**, a felony, common scheme, as defined in Mont. Code Ann. §§ 33-1-1504(1)(b) and 45-2-101(8) (2019). From approximately January 31, 2020, to May 29, 2020, the Defendant, pursuant to a common scheme, purposely or knowingly presented or caused to be presented to or by an insurer a materially false or altered application of insurance. The Defendant presented or caused to be presented to Colonial approximately 51 materially false or altered applications of insurance involving fictitious "employees" of Hays Dental.

The Defendant's series of acts resulted in a pecuniary loss to the victim of at least \$1,500, or \$1,500 in value.

A person convicted of the offense of insurance fraud involving a common scheme shall be fined an amount not to exceed \$50,000 or be imprisoned in a state prison for a term not to exceed 10 years, or both.

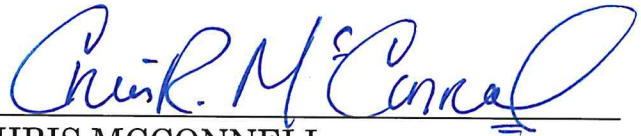
### **WITNESSES**

The following witnesses for the State are currently known to the prosecution:

Neil Brunett, CSI, Helena, MT

Troy Smith, CSI, Helena, MT  
B. Lee Thomas, Colonial Life, Columbia, SC  
Carl Cantrell, Colonial Life, Columbia, SC  
Denise Dunkley, Colonial Life, Columbia, SC  
Dax Chandler, LP Anderson, Billings, MT  
Lindsay Kautz, Sylvan Landscaping, Billings, MT  
Torri McKee, Billings, MT  
Shelly Lehman, Family Tree, Billings, MT  
Karena Askeland, Hays Dental, Bozeman, MT  
Colonial Life representatives or employee(s)  
Unum representative or employee(s)  
Custodians of record  
Any witness identified in discovery

RESPECTFULLY SUBMITTED this 29<sup>th</sup> day of November, 2021.



CHRIS MCCONNELL

*Special Deputy Yellowstone County Attorney*